

# Exhibit Q

*to*

*Memorandum in Support of Defendant's Post-Trial Motion for  
Judgment of Acquittal or in the Alternative for a New Trial*



U.S. Department of Justice

United States Attorney  
Southern District of New York

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The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

April 9, 2018

Baruch Weiss, Esq.  
Andrew Bauer, Esq.  
Arnold & Porter  
601 Massachusetts Avenue, NW  
Washington, DC 20001

**Re:     *United States v. Ali Sadr Hashemi Nejad, 18 Cr. 224 (ALC)***

Dear Mr. Weiss and Mr. Bauer:

This letter provides discovery pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure ("Fed. R. Crim. P."), and seeks reciprocal discovery. Based on your request for discovery in this case, we have enclosed copies of the following materials, which are stamped with control numbers 000452 through 000715:

- Search warrants and affidavits;
- Immigration files.

The Government recognizes its obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny. To date, the Government is unaware of any *Brady* material regarding your client, but will provide timely disclosure if any such material comes to light.

Very truly yours,

GEOFFREY S. BERMAN  
United States Attorney

by: /s/ Matthew Laroche

Andrew DeFilippis  
Matthew Laroche  
Garrett Lynch  
Assistant United States Attorneys  
(212) 637-2420